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March 12, 2020

BY ECF

Honorable John G. Koeltl
United States District Judge
for the Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, New York 10007

Re: **U.S. v. TIMOTHY MITCHELL**, 19 Cr. 843 (JGK)

Dear Judge Koeltl:

I am the attorney for the defendant Timothy Mitchell in the above-referenced matter. Mr. Mitchell is charged with being Felon in possession of firearm, in violation of 18 U.S.C. § 922 (g)(1). Pretrial Hearings are currently scheduled for May 27, 2020; and *in limine* motions are scheduled for June 15, 2020. The purpose of this letter is to respectfully request that the Court schedule pre-trial hearings for June 15, 2020; and re-schedule the date of *in limine* motions to a date after June 15, 2020. The government has no objection to this request.

During the March 10, 2020 conference, when the Court scheduled Pre-Trial Hearings for May 27, 2020, I did not realize that on May, 18, 2020 I am expected to start a three-week trial before the Honorable Victor Marerro in U.S.D.J., U.S. v. Damir Pejckimovic, 18 Cr. 767 (VM). This trial would then be conflict with current pre-trial hearing date of May 27, 2020. As such, I seek to move the May 27, 2020 date for the pre-trial hearing in U.S. v. Mitchell, 19 Cr. 843 (JGK) to June 15, 2020, a date when the parties are both available and adjust the current *in limine* motions date of June 15, 2020 accordingly.

Accordingly, I respectfully request, **without government objection**, that the Court schedule the Pre-trial Hearing in U.S. v. Timothy Mitchell, 19 Cr. 843

1. Pre-Trial hearing
adjourned to 6/15/20 at 10⁰⁰ A.M.

2. Motions - *in limine*, Voir Dire,
Requests to Change Date
6/22/20. Responses
due 6/24/20. Trial
Pre-Trial Conf. at

6/26/20 at 2³⁰

Trial 7/7/20 at 9⁰⁰ A.M.

so ordered.

3/12/20

U.S.D.S.

3/12/20

Honorable John G. Koeltl, U.S.D.J.
March 12, 2020

(JGK) for June 15, 2020; and schedule the date of *in limine* motions, currently scheduled for June 15, 2020, for some date thereafter.

Your Honor's attention to and consideration of this request are, as always, greatly appreciated.

Respectfully submitted,

Peter Enrique Quijano

Peter Enrique Quijano

cc: A.U.S.A Ni Qian by email & ECF (Ni.Qian@usdoj.gov)